



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

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**OFFICE OF
ENVIRONMENTAL
CLEANUP**

MEMORANDUM

DATE: September 27, 2016

SUBJECT: Riverbank Source Control Measure Completion Report
EVRAZ Oregon Steel
ECSI #141
May 27, 2016

FROM: Eva DeMaria, Remedial Project Manager *EDM*

TO: Jennifer Sutter, Project Manager
Oregon Department of Environmental Quality

Following are the United States Environmental Protection Agency's (EPA's) comments on Evraz Oregon Steel (EOS) Riverbank Source Control Measure Completion Report (SCM Completion Report) dated May 27, 2016. The site is listed as ECSI #141 and is located on the eastern bank of the Willamette River at approximately river mile 2 (RM2E) and comprises approximately 145 acres. In 2014, the site was given DEQ's priority of "High" related to bank erosion in DEQ's Portland Harbor Upland Source Control Summary Report (November 2014).

EPA's comments are presented in the following sections. Comments are separated as: "Primary," which identify concerns that must be resolved to achieve the assessment's objective; and "To Be Considered," which, if addressed or resolved, would reduce uncertainty, improve confidence in the document's conclusions, and/or best support the assessment's objectives.

Primary Comments

1. Insufficient documentation of imported berm backfill placement and compaction is presented in the SCM Completion Report to determine if berm construction meets the design specification. Documentation of the requirements and performance of compaction should be added to Section 3.3.2 of the report. The report appendix should contain results of the Proctor test for the imported berm backfill soil and field compaction testing reports. Proper placement and compaction of the imported berm backfill affects the stability of the reconstructed berm and should be documented in the report. The Berm Construction Design Modification in Appendix H and the Seismic Design Report included in Attachment K, specify berm back fill placement and compaction in 8-inch lifts with compaction to 90 or 92% of the dry density. The June 18, 2015 Final Design Report specified that imported berm soil be placed in lifts of 8-inch maximum thickness. Each lift would be compacted to 92% of its dry density, as determined by ASTM 1557 (modified Proctor), and a minimum of one field compaction test would be completed for each 250 cubic yards of berm backfill soil placed.
2. Based on the data presented, soil contaminated with PCBs greater than 100 micrograms per kilogram (ug/kg) was left in place in an area of the upper beach identified by sample location S-

55d. This area was not called out as a focus area for erosion inspection in the SCM Completion Report and the Monitoring and Maintenance. EPA recommends erosion indicator monuments be installed in the S-55d decision unit and this area should be called out in the SCM Completion Report and the Monitoring and Maintenance Plan due to the high levels of PCBs left in place. Monitoring events should also include visual monitoring and photograph point reporting to document any visible erosion that goes down to or below the clean cap layer. In addition, the 3-foot depth sample at S-55d has the highest manganese concentration (3,680 mg/kg) of all soil remaining in place in the upper beach area.

3. EPA should be provided an opportunity to review and comment on the Easement and Equitable Servitude that EOS plans to file. Review is warranted to verify that suitable institutional controls are in place to prevent future activities that may compromise the stabilized riverbank and beach. In addition, the easement should be reviewed to verify whether future access is provided for EPA inspections related to the Portland Harbor Superfund Site remedial action.
4. Documentation of the disposal of soil cuttings from the decommissioning of the bank area monitoring wells by over-drilling should be provided in SCM Completion Report. These monitoring wells were located in areas of potential slag contamination and the soil generated by over-drilling is subject to the soil management requirements of the project.

To Be Considered

1. The Monitoring and Maintenance Plan includes some different monitoring locations in Table 2 than are shown on Figure 4 through 7, which is confusing. All monitoring points in Table 2 should be shown on Figures 4 through 7.
2. The Monitoring and Maintenance Plan Section 2.4 describes a minimum of four photographs being taken at each of the photograph points. The plan should describe what view should be captured by each of the four photographs so that comparable photographs are obtained during each inspection event. The photo-documentation plan is unclear whether there will be four permanent photo locations (as shown on Figures 1 & 2) or a total of eight locations. The plan section 2.4 should clarify the total number of photos inferred by the statement copied below:
“Four additional locations will be photographed of the bank at the approximate locations shown on Figures 1 and 2, including three locations on the bank within the main project area and one location on the bank in the southern riverbank removal area.”
3. Table 3 of the SCM Completion Report: the import criteria for PCBs, pesticides, semi-volatile organic compounds, and metals are not listed on the first four pages and the last page of the table. A column with the import criteria should be included on each page of the table for comparison of results.